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Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: In the Matter of the Reporting Requirements for U.S. Providers of International Telecommunications Services, IB Docket No. 04-112

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission rules, 47 C.F.R. § 1.206, Verizon hereby submits this letter summarizing an *ex parte* presentation by Verizon, AT&T, and Sprint yesterday, April 19, 2005, in the above-referenced docket. Doug Schoenberger and Jim Talbot from AT&T, David Nall and Marybeth Banks from Sprint, and Leslie Owsley, Jennifer Ullman and I from Verizon met with staff of the International Bureau and Wireline Competition Bureau: Jim Ball, Linda Blake, John Copes, Jerry Duvall, Joann Ekblad, Claudia Fox, Cathy Hsu, David Krech, Jim Lande, Susan O'Connell, Peggy Reitzel, Mark Uretsky, and Irene Wu.

We discussed the shared views of our companies on the NPRM on Reporting Requirements for U.S. Providers of International Telecommunications Services. We explained our view that it is in the public interest to eliminate or significantly streamline the reporting requirements, given the current competitiveness of the marketplace for international services and increased liberalization of foreign markets. Further, any limited usefulness of the reports to carriers is far outweighed by the burdens of complying with the reporting requirements.

We suggested that the Commission could meet its analytic and public interest objectives for information on international services through a combination of existing external sources, limited and streamlined annual reports by carriers, and case-by-case information for specific proceedings. While this information would not replicate the detail contained in the current reports, it would more closely reflect the highly competitive wholesale market for international services that has forced significant changes in the traditional international settlements process. External sources include the following: (1) U.S. carrier retail rates (from U.S. carrier web sites); (2) U.S. carrier wholesale rates (from web sites such as Arbinet or Band-x); (3) third-party consultant analyses that also provide

international telecom data; (4) public web sites that include international telecom information, including <http://www.iscpc.org/> which covers undersea cables; and (5) multilateral groups that also produce broad studies on global telecom including the ITU, CITELE, and the OECD.

All carriers at the meeting stated that we would be prepared to provide the following streamlined information on a global, aggregate, annual basis:

- Minutes
- Revenues
- Inbound settlements
- Outbound settlements
- Circuits (64K equivalents)

Taken together, this external and carrier information will allow the Commission to continue to track trends in international prices and settlement payments, as well as allow for fee assessment based on carriers' circuits. Discussion during the meeting noted that regulators in other countries do not generally require carriers to provide the type of detailed reporting on international services that the Commission does.

Furthermore, with respect to specific investigatory matters, should the Commission suspect that anti-competitive behavior is occurring on a route, it can seek route-specific information to analyze and address these concerns. History has shown that U.S. carriers are not hesitant to provide, and in fact volunteer, this type of information in these situations. For analyses of transfers of licenses or other authorizations, the parties to the transactions will have the burden to provide specific information required to assist the Commission in its analysis. Again, carriers seeking approvals for these transactions are highly motivated to provide information required.

Respectfully submitted,

/s/ Jacquelyn Ruff

cc: Jim Ball
Linda Blake
John Copes
Jerry Duvall
Joann Ekblad
Claudia Fox
Cathy Hsu
David Krech
Jim Lande
Susan O'Connell
Peggy Reitzel
Mark Uretsky
Irene Wu